

U.S. Department of Justice

*United States Attorney
Eastern District of New York*

*271 Cadman Plaza East
Brooklyn, New York 11201*

May 6, 2011

By ECF and Facsimile
Defense Counsel

Re: United States v. Bombino et al.
Criminal Docket No. 10-147(S-1)(SLT)

Dear Counsel:

In an excess of caution, the government provides the following information pursuant to the Supreme Court's decisions in Brady v. Maryland, 373 U.S. 83 (1963) and Giglio v. United States, 405 U.S. 150 (1972) that may be helpful to the defense:

Joseph Vollaro has advised that he believes defendant Edward Garofalo, Jr. to be an associate of the Gambino organized crime family.

The enclosed email between Marie Cruz of Testa Corporation and Paula DeMaio of Testa Corporation may be helpful to the defense relating to Counts Thirteen and Fourteen and Racketeering Act 10.

The July 12, 2010 consensual recording contained in discovery exhibit 888, referenced in the government's February 24, 2011 discovery letter, may have information helpful to the defense relating to Count Seven and Racketeering Act 6.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: _____ /s/
Amy Busa
Michael Tremonte
Rachel Nash
Assistant U.S. Attorneys

cc: Clerk of Court (SLT) (by ECF) (without enclosure)